

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

Network System Technologies, LLC,	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 2:22-cv-00481-JRG
	§	
Samsung Electronics Co., Ltd. et al.,	§	JURY TRIAL DEMANDED
Defendants.	§	
	§	

DECLARATION OF YORI XIAO

The undersigned Declarant, Yori Xiao, of lawful age, hereby declares, deposes and states as follows, under penalty of perjury:

1. I am the IP Counsel of Guangdong OPPO Mobile Telecommunications Corp., Ltd. (“OPPO”). Defendant OnePlus Technology (Shenzhen) Co., Ltd. (“OnePlus”) is an affiliate company of OPPO. I have personal knowledge of the matters asserted in this Declaration and I am authorized to make this Declaration on its behalf.

2. OnePlus does not make, use, sell, offer to sell, or import any accused products in the United States.

3. OnePlus does not design or manufacture any integrated circuits (“IC’s”), systems on chip (“SoC’s”), networks on chip (“NoC’s”), or chips of any kind, in part or in whole.

4. The only systems-on-chip (“SoC’s”) included in any OnePlus device sold in the US are Qualcomm SoC’s.

5. OnePlus does not make any modifications to or install any software controlling the internal operation of any Qualcomm chips.

6. OnePlus is not presently aware of any basis it would have to testify regarding the design, operation, or any other internal aspect or characteristic of any Qualcomm chips, except in


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reliance upon documents and information received from Qualcomm or, if Qualcomm chips contain Arteris NoC's, documents and information received from Arteris.

7. Qualcomm limits its information and documents (including source code) shared with OnePlus on a "need-to-know basis" so even OnePlus's second-hand knowledge of Qualcomm's chips is quite limited.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

**EXECUTED** this 6<sup>th</sup> day of May, 2023

  
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YORI XIAO, DECLARANT